

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE**

MICHELLE TORRES, *et al.*, on behalf of
themselves and those similarly situated,

Plaintiffs,

v.

W. DOUGLAS COLLINS, in his official
capacity as Hamblen County General
Sessions Judge, *et al.*,

Defendants.

Case No. 2:20-cv-00026-DCLC-CRW

(Class Action)

PLAINTIFFS' MOTION FOR ATTORNEYS' FEES AND NONTAXABLE EXPENSES

Plaintiffs respectfully submit this motion for attorneys' fees and nontaxable expenses that they are entitled to under 42 U.S.C. 1988(b).

As set forth in more detail in the accompanying Memorandum, Declarations of Seth Wayne and Jeff Stein, and additional materials, the rates Plaintiffs seek are reasonable, and the time billed was reasonably expended. Plaintiffs therefore respectfully move the Court to approve the requested amount of \$1,096,555.00 in fees and \$7,121.13 in nontaxable expenses.

Dated: April 16, 2025

Respectfully Submitted,

/s/ Seth Wayne

Seth Wayne (D.C. Bar 888273445)

(admitted *pro hac vice*)

Elizabeth Cruikshank (D.C. Bar 1614375)

(admitted *pro hac vice*)

Mary B. McCord (D.C. Bar 427563)

(admitted *pro hac vice*)

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CERTIFICATE OF SERVICE

I hereby certify that on the 16th day of April, 2025, I electronically filed the foregoing with the clerk of the court for the U.S. District Court, Eastern District of Tennessee, using the electronic case filing system of the Court. This filing will be served in accordance with the Federal Rules of Civil Procedure.

/s/ Seth Wayne